



Control Number: 49737



Item Number: 104

Addendum StartPage: 0

**SOAH DOCKET NO. 473-19-6862
PUC DOCKET NO. 49737**

2019 SEP 19 PM 2:22
FILING CLERK

APPLICATION OF SOUTHWESTERN	§	BEFORE THE STATE OFFICE
ELECTRIC POWER COMPANY FOR	§	
CERTIFICATE OF CONVENIENCE	§	OF
AND NECESSITY AUTHORIZATION	§	
AND RELATED RELIEF FOR THE	§	ADMINISTRATIVE HEARINGS
ACQUISITION OF WIND	§	
GENERATION FACILITIES	§	

**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY (SWEPCO)
QUESTION NOS. STAFF 2-1 THROUGH 2-3**

Pursuant to 16 Texas Administrative Code (TAC) § 22.144, the Staff of the Public Utility Commission of Texas (Staff) requests that Southwestern Electric Power Company (SWEPCO) by and through its attorneys of record, provide the following information and answer the following question(s) under oath. The question(s) shall be answered in sufficient detail to fully present all of the relevant facts, within the time limit provided by the Presiding Officer or within 20 days, if the Presiding Officer has not provided a time limit. Please copy the question immediately above the answer to each question. These question(s) are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.

Provide an original and three copies of your answers to the questions to the Filing Clerk, Public Utility Commission of Texas, 1701 N. Congress Avenue, P.O. Box 13326, Austin, Texas 78712-3326.

Dated: September 19, 2019

Respectfully Submitted,

**PUBLIC UTILITY COMMISSION OF TEXAS
LEGAL DIVISION**

Margaret Uhlig Pemberton
Division Director

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PUC DOCKET NO. 49737**

CERTIFICATE OF SERVICE

I certify that a copy of this document will be served on all parties of record on September 19, 2019, in accordance with 16 TAC § 22.74.



Rashmin J. Asher

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**COMMISSION STAFF'S SECOND REQUEST FOR INFORMATION
TO SOUTHWESTERN ELECTRIC POWER COMPANY (SWEPCO)
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DEFINITIONS

- A. "SWEPCO", "Company", or "you" refers to the Southwestern Electric Power Company and any and any person acting or purporting to act on their behalf, including without limitation, attorneys, agents, advisors, investigators, representatives, employees or other persons.
- B. "Document" includes any written, recorded, or graphic matter, however produced or reproduced, including but not limited to correspondence, telegrams, contracts, agreements, notes in any form, memoranda, diaries, voice recording tapes, microfilms, pictures, computer media, work papers, calendars, minutes of meetings or other writings or graphic matter, including copies containing marginal notes or variations of any of the foregoing, now or previously in your possession. In the event any documents requested by this Request for Information have been transferred beyond the Company's control, describe the circumstances under which the document was destroyed or transferred and provide an exact citation to the subject document. In the event that documents containing the exact information do not exist, but documents do exist which contain portions of the required information or which contain substantially similar information, then the definition of "documents" shall include the documents which do exist and these documents will be provided.

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INSTRUCTIONS

- 1) Pursuant to 16 TAC § 22.144(c)(2), Staff requests that answers to the requests for information and requests for admission be made under oath.
- 2) Please copy the question immediately above the answer to each question. State the name of the witness in this cause who will sponsor the answer to the question and can vouch for the truth of the answer.
- 3) These questions are continuing in nature, and if there is a relevant change in circumstances, submit an amended answer, under oath, as a supplement to your original answer.
- 4) Words used in the plural shall also be taken to mean and include the singular. Words used in the singular shall also be taken to mean and include the plural.
- 5) The present tense shall be construed to include the past tense, and the past tense shall be construed to include the present tense.
- 6) If any document is withheld under any claim of privilege, please furnish a list identifying each document for which a privilege is claimed, together with the following information: date, sender, recipients or copies, subject matter of the document, and the basis upon which such privilege is claimed.
- 7) Pursuant to 16 TAC § 22.144(h)(4), if the response to any request is voluminous, please provide a detailed index of the voluminous material.
- 8) Staff requests that each item of information be made available as it is completed, rather than upon completion of all information requested.

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- Staff 2-1 If SWEPCO uses the 30-year life method of depreciation for tax purposes for the wind facilities, how does the projected utilization of the PTC's change over the life of the project as compared to SWEPCO's plan to classify the wind facilities as five-year property under MACRS for income tax purposes? Do any IRS regulations preclude the Company from using the 30-year life method? If so, please identify. Please list all assumptions used in estimating the cost for the gen-tie alternative, including the length of all segments (i.e. the main line and each of the legs to the Selected Wind Facilities.
- Staff 2-2 In PUC Docket No. 47461, SWEPCO determined that current and forecasted congestion in the SPP transmission system necessitated construction of a gen-tie from the Windcatcher facility to Tulsa to ensure adequate transmission capacity for the wind farm's output. Is there a significant difference in the congestion forecast for the Selected Wind Facilities when compared with that of the Windcatcher facility?
- Staff 2-3 Are there interconnection agreements with SPP for all of the Selected Facilities? If not, what is the timeline for these?